## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI SOUTHERN DIVISION

MAGGIE RUSSELL,

Case No. 1:22-cy-00086-TBM-RPM

Plaintiff,

v.

MISSISSIPPI GULF COAST COMMUNITY COLLEGE through its Board of Trustees, et al.,

Defendants.

## PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT (ECF 31)

NOW COMES Plaintiff by and through her attorneys of record and submits this Response to Defendant's Motion for Summary Judgement pursuant to Fed. R. Civ. P. 56.

Plaintiff filed the present action on April 11, 2022, after Plaintiff suffered discrimination in violation of the ADA and Rehabilitation Act. Defendants discriminated against Plaintiff by failing to provide her with reasonable accommodations for her disability. Genuine disputes of material fact still remain. As such, Plaintiff submits it's Brief in Support of it's Response to Defendant's Motion for Summary Judgment.

Plaintiff respectfully prays to this honorable Court to deny Defendant's Motion for Summary Judgment in its entirety and set this matter for trial.

Dated: May 22, 2023 Respectfully Submitted,

By: /s/ Keith Altman

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Attorneys for Plaintiff

## **CERTIFICATE OF SERVICE**

I, Keith Altman, do hereby certify that I electronically filed the foregoing document with the Clerk of Court using the ECF system which sent notification of such filing to all counsel of record as listed in the Service List in effect on the date of electronic filing.

SO CERTIFIED, this 22nd day of May, 2023.

/s/ Keith Altman
Keith Altman, Esq.